

GIBSON, DUNN & CRUTCHER LLP  
CATHERINE A. CONWAY, SBN 98366  
cconway@gibsondunn.com  
JESSE A. CRIPPS, SBN 222285  
jcripps@gibsondunn.com  
MEGAN M. LAWSON, SBN 294397  
mlawson@gibsondunn.com  
JESSICA DENT, SBN 318216  
jdent@gibsondunn.com  
333 South Grand Avenue  
Los Angeles, California 90071-3197  
Telephone: 213.229.7000  
Facsimile: 213.229.7520

Attorneys for Defendants  
CHEVRON CORPORATION, and CHEVRON GLOBAL  
TECHNOLOGY SERVICES COMPANY

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

JOHN DOE, an individual,

Plaintiff,

v.

CHEVRON CORPORATION, and CHEVRON  
GLOBAL TECHNOLOGY SERVICES CO.,

Defendants.

CASE NO. 3:25-cv-04534-WHO

**DECLARATION OF MEGAN M.  
LAWSON IN SUPPORT OF  
DEFENDANTS' OPPOSITION TO  
PLAINTIFF'S ADMINISTRATIVE  
MOTION FOR LEAVE TO FILE A  
REPLY IN SUPPORT OF PLAINTIFF'S  
MOTION TO PROCEED UNDER A  
PSEUDONYM**

1 I, Megan M. Lawson, declare as follows:

2 1. I am an attorney admitted to practice law before the United States District Court for the  
3 Northern District of California. I work at the law firm of Gibson, Dunn & Crutcher LLP, and am one  
4 of the attorneys representing Defendants Chevron Corporation and Chevron Global Technology  
5 Services Company (“Defendants”) in the above-titled action. I have personal knowledge of the matters  
6 stated herein, and if asked to testify about them, I could and would do so competently.

7 2. Prior to filing Plaintiff’s lawsuit, counsel for Plaintiff, Bryan Schwartz and Erica Posey  
8 of Bryan Schwartz Law, P.C. were aware that my colleague, Catherine A. Conway, and I represented  
9 Defendants in connection with Plaintiff’s claims. Ms. Conway and I were listed as recipients of the  
10 EEOC’s Dismissal and Notice of Rights issued to Plaintiff’s counsel on March 3, 2025. Ms. Conway  
11 and I also communicated with Mr. Schwartz about Plaintiff’s claims before the filing of this lawsuit.

12 3. On May 27, 2025, Mr. Schwartz inquired whether my office would accept service of  
13 Plaintiff’s Complaint. Ms. Conway requested a copy of the Complaint.

14 4. In the morning on May 29, 2025, Ms. Posey provided a caption page for Complaint’s  
15 and also provided a caption page for Plaintiff’s Administrative Motion to Proceed Under a Pseudonym.

16 5. In the afternoon on May 29, 2025, Mr. Schwartz emailed a copy of the Complaint to  
17 Ms. Conway and me. Mr. Schwartz also stated in his email that “[t]he pseudonym motion is being filed  
18 now as well” and instructed a member of his team to share “when it’s docketed.” Shortly after, Plaintiff  
19 filed his Administrative Motion to Proceed Under a Pseudonym.

20 6. On May 30, 2025, Ms. Conway responded to Mr. Schwartz and agreed that Defendants  
21 would accept service of the Complaint, effective Monday, June 2, 2025. Ms. Posey replied, “Thank you  
22 for confirming.” Attached as **Exhibit A** is a true and correct copy of the email correspondence between  
23 Plaintiff’s counsel and my office described in Paragraphs 4 through 6 above.

24 7. On June 2, 2025, after Defendants filed a Notice of Appearance in this Action, and the  
25 same day Defendants’ opposition to Plaintiff’s Administrative Motion to Proceed Using a Pseudonym  
26 was due, Mr. Schwartz emailed Ms. Conway: “Assume you aren’t going to oppose the pseudonym  
27 motion, right?” Ms. Conway responded that Defendants would oppose and would file their opposition  
28

1 that day. Attached as **Exhibit B** is a true and correct copy of that correspondence, which Ms. Conway  
2 forwarded to me.


3 8. Plaintiff's counsel did not attempt to meet and confer with Ms. Conway or me before  
4 filing his Administrative Motion to Proceed Under a Pseudonym. Had Plaintiff's counsel asked whether  
5 they could meet and confer with my office in connection with Plaintiff's Motion, Ms. Conway and I  
6 would have accepted the invitation and explained that Defendants are amenable to discussing safeguards  
7 that would allow Plaintiff to proceed in this Action using his name while protecting D.P.'s medical  
8 information, including redacting D.P.'s initials and medical information entirely from the public record.  
9 Defendants remain willing to discussing additional safeguards to protect D.P.'s information.

10 I declare under penalty of perjury under the laws of the United States and the State of California  
11 that the foregoing is true and correct.

12  
13 Executed on June 6, 2025, in Los Angeles, California.

14  
15 Respectfully submitted,

16 GIBSON, DUNN & CRUTCHER LLP

17 By: 

18 Megan M. Lawson, Bar No. 294397

19 Attorneys for Defendants CHEVRON  
20 CORPORATION, and CHEVRON GLOBAL  
21 TECHNOLOGY SERVICES COMPANY  
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